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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**VORRIS BENJAMIN HUNTER**

**Plaintiff,**

**vs.**

**REALPAGE, INC.**

**Defendant.**

**Civil Action No. 2:16-cv-02717-PA-  
MRW**

**STIPULATION TO TRANSFER  
VENUE AND TO BRIEFLY  
EXTEND MOTION CUT-OFF  
DATE**

Hon. Percy Anderson

Current Motion Cut-Off: 1/9/2017  
Proposed Motion Cut-Off: 1/30/2017

1 Plaintiff Vorris Benjamin Hunter (“Plaintiff”) and Defendant RealPage, Inc.  
2 (“RealPage”) (collectively, the “Parties”), by counsel, hereby submit the following  
3 Stipulation to Transfer Venue and to Briefly Extend the Motion Cut-Off Date. In  
4 support of this Stipulation, the Parties state as follows:

5 **BACKGROUND**

6 1. On April 20, 2016 Plaintiff filed the Complaint in the above referenced  
7 action. (ECF No. 1.)

8 2. On July 28, 2016, the Court entered a scheduling order that established  
9 December 26, 2016 as the discovery cut-off. (ECF No. 16.)

10 3. The scheduling order also established January 9, 2016 as the “last day  
11 motions may be heard.” (ECF No. 16.)

12 4. Pursuant to the Local Civil Rules of the Central District of California,  
13 Rule 6.1, the notice of a motion must be served not later than twenty-eight days  
14 prior to the date set for hearing. Accordingly, pursuant to the Court’s scheduling  
15 order, the last day to file motions is currently December 12, 2016.

16 5. Plaintiff currently lives in Brentwood, California, which is just outside  
17 of Oakland, California.

18 6. Plaintiff recently suffered a serious stroke and is unable to travel to the  
19 Los Angeles area for depositions, mediation, or trial.

20 **STIPULATION TO TRANSFER VENUE**

21 7. 28 U.S.C. § 1404(a) states: “For the convenience of parties and  
22 witnesses, in the interest of justice, a district court may transfer any civil action to  
23 any other district or division where it might have been brought or to any district or  
24 division to which all parties have consented.”

25 8. The Parties agree that the case could have been brought in the United  
26 States District Court for the Northern District of California, pursuant to 28 U.S.C.  
27 § 1391(b)(2).

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1           9. In order to accommodate the serious health condition from which  
2 Plaintiff is suffering, the Parties have agreed that for the convenience of the Parties,  
3 and in the interest of justice, the case should be transferred to the United States  
4 District Court for the Northern District of California.

5           10. The relief requested herein is for good cause, will conserve judicial  
6 resources, and will not result in undue delay in the administration of this case.

7           11. Accordingly, the Parties request that the Court enter an order  
8 transferring this case to the United States District Court for the Northern District of  
9 California.

10                   **STIPULATION TO EXTEND MOTION CUT-OFF DATE**

11           12. Defendant initially noticed Plaintiff's deposition for December 6,  
12 2016. However, due to scheduling issues related to Plaintiff's stroke, the Parties  
13 were not able to find a mutually agreeable date for the deposition prior to December  
14 12, 2016, the current deadline to file motions.

15           13. The Parties are finalizing the schedule for Plaintiff's deposition, which  
16 is set to take place during either during the week of December 19th or December  
17 26th.

18           14. Defendant intends to file a motion for summary judgment, and prior to  
19 filing such a motion, needs to first take Plaintiff's deposition.

20           15. The parties agree that the January 9, 2017 motion hearing cut-off date  
21 should be continued to January 30, 2017, in order to allow Defendant time to  
22 conduct a deposition of Plaintiff prior to filing its motion for summary judgment.

23           16. The relief requested herein is for good cause, will conserve judicial  
24 resources, and will not result in undue delay in the administration of this case.

25           17. Accordingly, the Parties request that the Court enter an order extending  
26 the Motion Cut-Off Date **up to and including January 30, 2017.**

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**CONCLUSION**

For the reasons stated above, the Parties respectfully request that the Court issue an order (1) transferring the case to the United States District Court for the Northern District of California and (2) extending the Motion Cut-Off Date up to and including January 30, 2017.

Respectfully Submitted,

s/ Stephanie R. Tatar

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